

RECEIVED

APR 15 2022

Initial: _____

Barbara Batke, DVM

1425 E. Wells Fargo Rd.
Prescott, AZ 86303

April 7, 2022

Arizona State Veterinary Medical Examining Board
1740 W. Adams Street, STE. 4600
Phoenix, AZ 85007

To whom it concerns:

On February 4th, 2022, I responded to a post on a Facebook group called "For Veterinary Use Only" regarding an inquiry from the Colorado Veterinary Medical Association. The questionnaire was looking to obtain information and interest in a master's program for veterinary medicine. I posted the following:

"I actually support a version this, more so to elevate the status of a Vet Tech. I have an amazing CVT/VTS who started seeing urgent cases at our overrun ER. She is not allowed to perform surgery but can examine, perform diagnostics, and provide treatment under my care. She was essential when the ER intake was out of control and it helped ease the burden on the doctors. Her coverage gave us the ability to provide high quality care."

After some comments from other individuals in the post, I posted additional details a few hours after my original post:

"...it's not against our states statutes! We have state VMA board members, examining board member and AVMA representatives in our group and went through a thorough review with these channels. Although there is no specific statutes regarding "veterinary nurse practitioner" our state does not bar an individual of her advanced training (multiple VTS certificates on top of her CVT, published multiple times in the field and travels world wide to teach at conferences as a expert CVT/VTS) from acting as a extension to the veterinarian. Each case that is seen is reviewed by the veterinarian that she is working directly under. It's an unprecedented but it's the right direction to go if you have the right candidate."

It's definitely a frontier as there is nothing like this previously but when 1. Hospitals are becoming overwhelmed and your passion is to provide highest quality medicine and 2. The field is losing so many amazing and talented vet techs because they feel stagnated and undervalued in this field, sometimes an "extreme" solution (doesn't feel extreme to me) needs to be highly considered. I am more than happy to host any interested doctor at our hospital to go through this more thoroughly on how we operate this. I'm here to change minds."

I feel horrible by how low on the totem pole talented vet techs have been put since I've been a doctor. I've worked in too many clinics where they are paid near minimum wage despite their vast skill set. Where the only real money is becoming the hospitals manager. Many do not want to do that, many want to be involved in the medical aspect of this field. But they also need to feed their family and keep a roof over their heads.

Do many of you not remember what it's felt like in our field since the pandemic? Have you not experienced burn out or compassion fatigue? Have you not experienced a seasoned vet tech leave the field because they are sick of living pay check to pay check and can make more money in a different occupation that doesn't require a college degree?

I am a small business owner in this field, but I have big dreams for this profession. I see a vision where a transition of a "advanced veterinary nurse practitioner" (I'm sure the name will change) brings balance and positive changes to the field. Where an advanced version of a vet tech can THRIVE on their salary, not just SURVIVE. Where they have a renewed sense of accomplishment, learning, and occupational satisfaction. I want veterinarians and veterinary technicians to be the best field in the world to work in. That comes with change.

We have a small group of individuals how are in support of this, but in a way that benefits our field. I am in agreement in that I have opposition with how corporate entities and other groups may try to monetize and take advantage of these individuals. We have met with lobbyists and with other hospitals instituting this change that mutually benefits all individuals. This can be done right, and we are going down proper channels to accomplish a positive change for vet techs and veterinarians alike.

If this is the first time you've heard of Advanced Veterinary Nurse Practitioner and you want to learn more, Ken Yagi is an amazing human and is an open book. A true champion in the veterinary field."

To my understanding, an anonymous individual within the group called "For Veterinary Use Only" took a screen shot of my first post and submitted it to the Arizona Veterinary Examining Board. I never received any messages from any individuals regarding this post, even though I specifically offered opportunity to further discuss details of this position and how it is utilized at Yavapai Emergency Veterinary Hospital.

The position I described in these posts is known as an Advanced Practice Veterinary Nurse (APVN). At Yavapai Emergency Animal Hospital, an APVN is responsible for handling patient visits to ensure patient health. Their duties include triaging, direct communication with clients, completing veterinarian ordered diagnostic tests, instructing and directing the team, setting up hospitalized patient

orders, performing veterinarian approved treatments, completing medical records, and discharge instructions.

All examinations are conducted in tandem with the attending veterinarian. All diagnosis, prognosis, orders and final medical records are the responsibility of the attending veterinarian.

An APVN's duties and responsibilities vary depending on skill level and experience, including:

- Triaging
- Providing primary and critical care to patients
- Performing cooperative physical examinations
- Setting up, monitoring and operating medical equipment
- Ordering, administering diagnostic tests for attending veterinarian interpretation
- Communicating DVM interpreted diagnostics/test results to clients
- Complete medical record documentation (e.g. SOAP/Treatment Sheets, etc.)
- Performing pre-approved treatments
- Setting up ordered treatment plans for in-patients
- Communicating appropriate follow-up care

The APVN is NOT allowed to diagnose, prognose, write prescriptions or perform surgery.

An Advanced Practice Veterinary Nurse requires the following qualifications:

- CVT
- VTS (ECC or SAIM)
- Three years experience as VTS
- Preferred Leadership experience
- Approval by the YEAH leadership team, including medical director and hospital administrator
- Approval by veterinarians who shall utilize and be responsible for the APVN on given shifts.

We hired one CVT who has a VTS in both ECC and SAIM who fit these qualifications. From September 2021 to February 2022, she worked as an APVN under the direct supervision of the attending/staff veterinarian. All records were reviewed and attached to the attending veterinarian. This individual left our practice in March 2022 to a corporate veterinary entity and will be performing an identical position at that hospital. At this time, we do not have any CVTs acting as APVN as we do not employ one that fits the above requirements.

In my post, I specifically used the words "diagnostic tests". The APVN/CVT would perform diagnostics under the direct guidance of the attending veterinarian. These diagnostics would be interpreted by the same attending veterinarian, and the results and treatment recommendations would be

discussed with the APVN/CVT. The APVN never provided a diagnosis, that would be provided by the attending veterinarian. Please find the definitions of a diagnosis vs a diagnostic below:

Diagnosis is defined as the process of recognizing an injury, condition, or disease from the signs and symptoms the individual is displaying. **Diagnostic** tests are used to ascertain a diagnosis. Blood tests, health history, physical assessments, and other procedures may be used to help make a diagnosis.

At Yavapai Emergency Animal Hospital, we take the responsibilities of veterinarians and certified veterinary technicians seriously and utilize the Arizona State Statutes when developing job duties. While developing the Advanced Practice Veterinary Nurse position, we used the follow statues and rules set in place by the veterinary examining board:

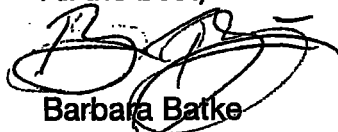
*"ARS 32-2241 Certified veterinary technician; services performed
A certified veterinary technician may perform those services authorized by the Board pursuant to section 32-2245 in the employ of and under the direction, supervision and control of a licensed veterinarian who shall be responsible for the performance of the certified veterinary technician. Compensation for such authorized services shall be derived solely from the employing veterinarian."*

*"ARS 32-2245 Certified veterinary technician; services; rules and regulations
A. The Board shall adopt rules and regulations pertaining to and limiting the services performed by a certified veterinary technician.
B. Services performed by a certified veterinary technician shall not include surgery, diagnosis or prognosis of animal disease or prescribing of drugs and medicine."*

I understand and honor the state statutes and rules on what a CVT is allowed and not allowed to do in the state of Arizona. This is why the requirements for an APVN are so exclusive. The majority if CVTs would not qualify for this position and thus, do not act as a APVN at Yavapai Emergency Animal Hospital. Once again, an APVN is not allowed to provide diagnosis, prognosis, prescriptions, or perform surgery and this has never occurred at Yavapai Emergency Animal Hospital.

I welcome any further questions and will comply with any requests made by the examining board regarding this matter.

All the best,



Barbara Batke

DVM, Medical Director

Yavapai Emergency Animal Hospital



Advanced Practice Veterinary Nurse

An Advanced Practice Veterinary Nurse (APVN), is responsible for handling patient visits to ensure patient health. Their duties include triaging, direct communication with clients, completing ordered diagnostic tests, instructing and directing the team, setting up hospitalized patient orders, performing pre-approved treatments; completing medical records, and discharge instructions.

All examinations are conducted in tandem with the attending veterinarian. All diagnosis, prognosis, orders and final medical records are the responsibility of the attending veterinarian.

Advanced Practice Veterinary Nurse Duties and Responsibilities

An APVN's duties and responsibilities vary depending on skill level and experience, including:

- Triaging
- Providing primary and critical care to patients
- Performing cooperative physical examinations
- Setting up, monitoring and operating medical equipment
- Ordering, administering diagnostic tests for attending veterinarian interpretation
- Communicating DVM interpreted diagnostics/test results to clients
- Complete medical record documentation (e.g. SOAP/Treatment Sheets, etc.)
- Performing pre-approved treatments
- Setting up ordered treatment plans for in-patients
- Communicating appropriate follow-up care

The APVN is NOT allowed to diagnose, prognose, write prescriptions or perform surgery.

Advanced Practice Veterinary Nurse Qualifications

- CVT
- VTS (ECC or SAIM)
- Three years experience as VTS
- Preferred Leadership experience

- Approval by the YEAH leadership team, including medical director and hospital administrator
- Approval by veterinarians who shall utilize and be responsible for the APVN on given shifts.

More Detailed List of Duties

- Advanced tasks
 - US exams (e.g. aFAST, tFAST)
 - Feeding tube placement
 - Endoscopic examinations
- Discussion with DVM mandatory before visit completed or diagnostics/treatments initiated
 - Differentials
 - Diagnosis, prognosis
 - Proceed with diagnostics and treatments
 - Interpreting diagnostic results
- Physical assessment
- Lab work/cytology
- Gathering information
 - Anesthesia planning
 - Treatment planning
 - Hospitalization Orders
- Running CPR
- Emesis induction
- FLUTD procedures
- Nasogastric and esophagostomy tube placement
- Abdominocentesis
- Thoracocentesis
- US guided FNA and cystocentesis procedures
- Central Lines, IV, IO
- Basic wound care
- Bandage/splint/ cast placements
- Cutaneous FB (e.g. foxtails, porcupine quills etc)
- Anal gland abscesses
- Etc.

For Veterinary Use Only

🔒 Private group · 14.0K members



About

Discussion

Featured

Topics

Members

Events



Heather Bjornebo shared a link.

...

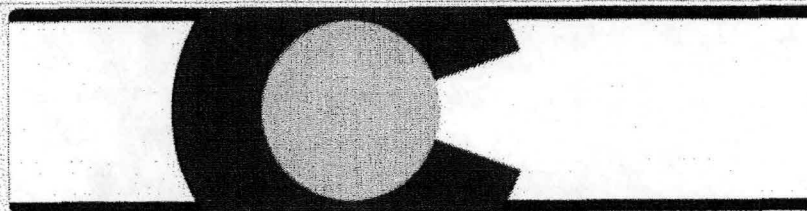
February 4 · 🌐

Who is ready to be paid less? They're going to start a VPA program so now CVTs well make less and we'll have to convince hospitals to hire a full vet instead of one of us and instead of cheaper VPAs.

Tell them no. The only reason they want this is to create money for their school. Predatory and evil.

THE LINK IS A SURVEY. PLEASE TAKE IT

<https://docs.google.com/.../1FAIpQLScNt7Jimiz.../viewform...>



Veterinary Professional Associate Survey

CVMA is assessing member interest in a "veterinary professional associate" (VPA) in Colorado.

CSU's College of Veterinary Medicine is considering developing a degree program for a Master's of Veterinary Clinical Care (MVCC). Graduates would be considered "veterinary professional associates" and would represent a mid-level practitioner in between veterinary technicians and veterinarians.

The role of a VPA would be similar to a physician's assistant in the human medical profession. A VPA would work under the direct supervision of a licensed veterinarian who would have the authority to delegate diagnosis, initiation of treatment, prescribing, and performing surgery to a competent VPA.



For Veterinary Use Only



Barbara Jean Batke Piotrowski

I actually support a version this, more so to elevate the status of a Vet Tech. I have an amazing CVT/VTs who started seeing urgent cases at our overrun ER. She is not allowed to perform surgery but can examine, perform diagnostics, and provide treatment under my care. She was essential when the ER intake was out of control and it helped ease the burden on the doctors. Her coverage gave us the ability to provide high quality care.

Like Reply 8w Edited



Pamela Emdin Kaiser

Barbara Jean Batke Piotrowski I do believe this is illegal everywhere. Be careful what you write here I would think.

Like Reply 8w



Jeanine Roper

Barbara Jean Batke Piotrowski Then she and others should be paid her/their worth. We don't need to add a VPA profession to the mix.

Like Reply 8w



Dorie Nelson

Barbara Jean Batke Piotrowski but your a privately owned group that would never abuse this. Imagine what Blue Pearl would do with Veterinary NPs, they would replace all the Vets. We all have that like 1 tech that could do it well but so many others that would miss important shit. I'd rather work on paying our CVTs what they are worth and then make sure doctors make an appropriate salary.



For Veterinary Use Only



Dorie Nelson

Barbara Jean Batke Piotrowski but your a privately owned group that would never abuse this. Imagine what Blue Pearl would do with Veterinary NPs, they would replace all the Vets. We all have that like 1 tech that could do it well but so many others that would miss important shit. I'd rather work on paying our CVTs what they are worth and then make sure doctors make an appropriate salary. Then we can talk about adding more positions to the profession. I think this will tank CVT salary even worse than where it is now.

Like Reply 8w



Barbara Jean Batke Piotrowski

Pamela Emdin Kaiser, jeanine roper, and Doris Nelson 😊 it's not against our states statutes! We have state VMA board members, examining board member and AVMA representatives in our group and went through a thorough review with these channels. Although there is no specific statutes regarding "veterinary nurse practitioner" our state does not bar an individual of her advanced training (multiple VTS certificates on top of her CVT, published multiple times in the field and travels world wide to teach at conferences as a expert CVT/VTS) from acting as a extension to the veterinarian. Each case that is seen is reviewed by the veterinarian that she is working directly under. It's an unprecedented but it's the right direction to go if you have the right candidate.

It's definitely a frontier as there is nothing like this



For Veterinary Use Only

It's definitely a frontier as there is nothing like this previously but when 1. Hospitals are becoming overwhelmed and your passion is to provide highest quality medicine and 2. The field is losing so many amazing and talented vet techs because they feel stagnated and undervalued in this field, sometimes an "extreme" solution (doesn't feel extreme to me) needs to be highly considered.

I am more than happy to host any interested doctor at our hospital to go through this more thoroughly on how we operate this. I'm here to change minds.

I feel horrible by how low on the totem pole talented vet techs have been put since I've been a doctor.

I've worked in too many clinics where they are paid near minimum wage despite their vast skill set.

Where the only real money is becoming the hospitals manager. Many do not want to do that, many want to be involved in the medical aspect of this field. But they also need to feed their family and keep a roof over their heads. ...

Do many of you not remember what it's felt like in our field since the pandemic? Have you not experienced burn out or compassion fatigue? Have you not experienced a seasoned vet tech leave the field because they are sick of living pay check to pay check and can make more money in a different occupation that doesn't require a college degree?

I am a small business owner in this field, but I have big dreams for this profession. I see a vision where a transition of a "advanced veterinary nurse practitioner" (I'm sure the name will change) brings



For Veterinary Use Only

I am a small business owner in this field, but I have big dreams for this profession. I see a vision where a transition of a "advanced veterinary nurse practitioner" (I'm sure the name will change) brings balance and positive changes to the field. Where an advanced version of a vet tech can THRIVE on their salary, not just SURVIVE. Where they have a renewed sense of accomplishment, learning, and occupational satisfaction. I want veterinarians and veterinary technicians to be the best field in the world to work in. That comes with change.

We have a small group of individuals how are in support of this, but in a way that benefits our field. I am in agreement in that I have opposition with how corporate entities and other groups may try to monetize and take advantage of these individuals. We have met with lobbyists and with other hospitals instituting this change that mutually benefits all Individuals. This can be done right, and we are going down proper channels to accomplish a positive change for vet techs and veterinarians alike.

If this is the first time you've heard of Advanced Veterinary Nurse Practitioner and you want to learn more, Ken Yagi is an amazing human and is an open book. A true champion in the veterinary field.

Like Reply 8w



Pamela Emdin Kaiser

Barbara Jean Batke Piotrowski when we have techs that can do the work properly maybe I would consider it But I have

DOUGLAS A. DUCEY
- GOVERNOR -



VICTORIA WHITMORE
- EXECUTIVE DIRECTOR -

ARIZONA STATE VETERINARY MEDICAL EXAMINING BOARD

1740 W. ADAMS ST., STE. 4600, PHOENIX, ARIZONA 85007
PHONE (602) 364-1-PET (1738) • FAX (602) 364-1039
VETBOARD.AZ.GOV

INVESTIGATIVE DIVISION REPORT

TO: Arizona State Veterinary Medical Examining Board

FROM: Investigative Division

RE: Case: 22-112

Complainant(s): Arizona State Veterinary Medical Examining Board

Respondent(s): Barbara Batke, D.V.M. (License: 6298)

SUMMARY:

Complaint Received at Board Office: 3/16/22

Board Discussion: 5/18/22

APPLICABLE STATUTES AND RULES:

Laws as Amended August 2018
(Lime Green); Rules as Revised
September 2013 (Yellow).

On February 4, 2022, Respondent commented on a social media post with her position and experience on utilizing technical staff in her veterinary practice.

On March 16, 2022, the Board voted to open an investigation to determine if Respondent was allowing her technical staff's duties to go beyond the legal scope.

PROPOSED 'FINDINGS of FACT':

1. On February 4, 2022, Respondent commented on a social media post with her position and experience on utilizing technical staff in her veterinary practice. The post stated in part...

"I have an amazing CVT/VTS who started seeing urgent cases at our overrun ER. She is not allowed to perform surgery but can examine, perform diagnostics, and provide treatment under my care. She was essential when the ER intake was out of control and it helped ease the burden on the doctors. Her coverage gave us the ability to provide high quality care."

2. On March 16, 2022, after reviewing the information submitted by an anonymous source, the Board voted to open an investigation.

3. On March 31, 2022, Respondent was sent a Letter of Inquiry and notified of the open investigation.

4. On April 15, 2022, a response was received from Respondent. She explained that the anonymous source only provided a portion of the discussion. The rest of the post is as follows:

"... it's not against our states statutes! We have state VMA board members, examining board member and AVMA representatives in our group and went through a thorough review with these channels. Although there is no specific statutes regarding 'veterinary nurse practitioner' our state does not bar an individual of her advanced training (multiple VTS certificates on top of her CVT, published multiple times in the field and travels world wide to teach at conferences as a expert CVT/VTS) from acting as a extension to the veterinarian. Each case that is seen is reviewed by the veterinarian that she is working directly under. It's an unprecedented but it's the right direction to go if you have the right candidate."

It's definitely a frontier as there is nothing like this previously but when 1. Hospitals are becoming overwhelmed and your passion is to provide highest quality medicine and 2. The field is losing so many amazing and talented vet techs because they feel stagnated and undervalued in this field, sometimes an "extreme" solution (doesn't feel extreme to me) needs to be highly considered. I am more than happy to host any interested doctor at our hospital to go through this more thoroughly on how we operate this. I'm here to change minds."

I feel horrible by how low on the totem pole talented vet techs have been put since I've been a doctor. I've worked in too many clinics where they are paid near minimum wage despite their vast skill set. Where the only real money is becoming the hospitals manager. Many do not want to do that, many want to be involved in the medical aspect of this field. But they also need to feed their family and keep a roof over their heads."

Do many of you not remember what it's felt like in our field since the pandemic? Have you not experienced burn out or compassion fatigue? Have you not experienced a seasoned vet tech leave the field because they are sick of living pay check to pay check and can make more money in a different occupation that doesn't require a college degree?"

I am a small business owner in this field, but I have big dreams for this profession. I see a

vision where a transition of a "advanced veterinary nurse practitioner" (I'm sure the name will change) brings balance and positive changes to the field. Where an advanced version of a vet tech can THRIVE on their salary, not just SURVIVE. Where they have a renewed sense of accomplishment, learning, and occupational satisfaction. I want veterinarians and veterinary technicians to be the best field in the world to work in. That comes with change.

We have a small group of individuals how are in support of this, but in a way that benefits our field. I am in agreement in that I have opposition with how corporate entities and other groups may try to monetize and take advantage of these individuals. We have met with lobbyists and with other hospitals instituting this change that mutually benefits all Individuals. This can be done right, and we are going down proper channels to accomplish a positive change for vet techs and veterinarians alike.

If this is the first time you've heard of Advanced Veterinary Nurse Practitioner and you want to learn more, Ken Yagi is an amazing human and is an open book. A true champion in the veterinary field."

5. Respondent explained that the position I described in these posts is known as an Advanced Practice Veterinary Nurse (APVN). At Yavapai Emergency Animal Hospital, an APVN is re-sponsible for handling patient visits to ensure patient health. Their duties include triaging, direct communication with clients, completing veterinarian ordered diagnostic tests, instructing and directing the team, setting up hospitalized patient orders, performing veterinarian approved treatments, completing medical records, and discharge instructions.

6. She continued that all examinations were conducted in tandem with the attending veterinarian. All diagnosis, prognosis, orders and final medical records were the responsibility of the attending veterinarian. The APVN is not allowed to diagnose, prognose, write prescriptions or perform surgery.

7. Respondent stated that they hired one CVT who fit specific qualifications from September 2021 to February 2022. The APVN/CVT would perform diagnostics under the direct guidance of the attending veterinarian. These diagnostics would be interpreted by the same attending veterinarian, and the results and treatment recommendations would be discussed with the APVN/CVT. The attending veterinarian would provide the attending veterinarian – never the APVN.

8. Respondent stated that she understands and honors the state statutes and rules on what a CVT is allowed and not allowed to do in the state of Arizona.

The information contained in this report was obtained from the case file, which includes the complaint, the respondent's response, any consulting veterinarian or witness input, and any other sources used to gather information for the investigation.

TR

Tracy A. Riendeau, CVT
Investigative Division